

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 23-11069 (CTG)  
(Jointly Administered)

**Re: Docket Nos. 6747, 6748 & 7540**

**NOTICE OF FILING MFN PARTNERS, LP AND  
MOBILE STREET HOLDINGS, LLC'S UPDATED PROPOSED  
SOLICITATION LETTER TO REJECT THE FOURTH AMENDED PLAN**

**PLEASE TAKE NOTICE** that on July 29, 2025, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Motion of Debtors for Entry of an Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Voting Procedures, (III) the Forms of Ballots and Notices in Connection Therewith, and (IV) Certain Dates with Respect Thereto* [Docket No. 6748] (“Solicitation Procedures Motion”)<sup>2</sup> with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that, on that same day, the Debtors filed the *Fourth Amended Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket. No. 6747] (the “Fourth Disclosure Statement”) and liquidating plan [Docket. No. 6746] (the “Fourth Plan”).

---

<sup>1</sup> A complete list of each of the debtors in these chapter 11 cases (the “Debtors”) may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall be given the meanings ascribed to them in the Solicitation Procedures Motion.

**PLEASE TAKE FURTHER NOTICE** that, on August 26, 2025, the MFN Partners, LP and Mobile Street Holdings, LLC (collectively, “MFN/Mobile Street”), filed the *Objection of MFN Partners, LP and Mobile Street Holdings, LLC to (A) Approval of Fourth Amended Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (B) Solicitation Procedures Motion* (the “Objection”) [Docket No. 7509]. Attached to the Objection as Exhibit 1 was a form of letter (the “Initial MFN/Mobile Street Letter”) for inclusion in the solicitation packages that MFN/Mobile Street prepared explaining why MFN/Mobile Street recommend voting against the Fourth Plan.

**PLEASE TAKE FURTHER NOTICE** that, on August 26, 2025, the Debtors filed the *Notice of Filing of Liquidating Trust Agreement in Connection with Plan Supplement* (the “Proposed LTA”) [Docket No. 7550].

**PLEASE TAKE FURTHER NOTICE** that, attached as Exhibit A hereto is the updated proposed MFN/Mobile Street Letter incorporating certain changes based on the Proposed LTA (the “Updated MFN/Mobile Street Letter”). Attached as Exhibit B hereto is a blackline of the Initial MFN/Mobile Street Letter against the Updated MFN/Mobile Street Letter. MFN/Mobile Street respectfully requests the inclusion of the Updated MFN/Mobile Street Letter into the Debtors’ proposed solicitation packages.

[Signature Page Follows]

Dated: September 4, 2025  
Wilmington, Delaware

Respectfully Submitted,

/s/ Maria Kotsiras  
L. Katherine Good (No. 5101)  
Maria Kotsiras (No. 6840)  
**POTTER ANDERSON & CORROON LLP**  
1313 N. Market Street, 6<sup>th</sup> Floor  
Wilmington, Delaware 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192  
Email: [kgood@potteranderson.com](mailto:kgood@potteranderson.com)  
[mkotsiras@potteranderson.com](mailto:mkotsiras@potteranderson.com)

– and –

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**  
Eric Winston (*pro hac vice* admitted)  
Benjamin Roth (*pro hac vice* admitted)  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
Email: [ericwinston@quinnmanuel.com](mailto:ericwinston@quinnmanuel.com)

*Counsel for MFN Partners, LP and Mobile Street Holdings, LLC*